

October 20, 2000

Mr. James Chang (SFD-8-1)
U.S. Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Contract No. 68-W-98-0220 / WA No. 220-11-09WQ George/Norton Air Force Base Work Assignment Review of the Response to Comments on the Draft Sampling and Analysis Plan Addendum Operable Units 1 and 3 Basewide Groundwater Monitoring Program, October 2000 Sampling Event, September 2000

Dear Mr. Chang,

Enclosed please find TechLaw's Review of the Response to Comments on the Draft Sampling and Analysis Plan Addendum Operable Units 1 and 3 Basewide Groundwater Monitoring Program, October 2000 Sampling Event dated September 2000 (the Comment Responses).

This review is being forwarded to you through electronic mail (via Internet) in WordPerfect® Version 8.0. A hard copy of the evaluation will also be submitted with this cover letter.

Thank you for the opportunity to provide U. S. EPA with technical services at George Air Force Base. TechLaw looks forward to working with you in the future. Should you have any questions, please call me at (415) 281-8730, ext.14.

Sincerely,

Indira Balkissoon
Site Manager

copy to: Angela Commisso, Region 9 w/o attachment
Joe Eidelberg, U.S. EPA
P. Brown-Derocher, Central Files

**GEORGE AIR FORCE BASE
Victorville, California**

**Review of the Response to Comments on the
Draft Sampling and Analysis Plan Addendum
Operable Units 1 and 3 Basewide Groundwater Monitoring Program,
October 2000 Sampling Event,
September 2000**

Submitted to:

**Mr. James Chang
EPA Work Assignment Manager
U.S. Environmental Protection Agency
Region IX (SFD-8-1)
75 Hawthorne Street
San Francisco, CA 94105**

Prepared by:

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U.S. EPA Work Assignment No.

220-11-09WQ

U.S. EPA Site ID No.

CA2570024453

Contract No.

68-W-98-220

U.S. EPA WAM

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**Review of the Response to Comments on the Draft Sampling and Analysis Plan Addendum
Operable Units 1 and 3 Basewide Groundwater Monitoring Program, October 2000
Sampling Event, September 2000**

General Comments:

1. **Comment Response Number 1** does not fully address the original comment. The original comment requested that a monitoring well screen elevations summary table be included similar to the table forwarded to the reviewers prior to the Sampling and Analysis Plan (SAP). The requested table was not included. Please include a table with monitoring well screen elevations in this document and in future groundwater monitoring SAP Addendums.
2. **Comment Number 2** appears to address the comment if a well screen depth analysis is included in the Basewide Groundwater Monitoring Report.

Specific Comments:

1. **Specific Comment Response Numbers 1 and 2** appear to address the comments.
2. **Specific Comment Response Number 3** does not appear to address the comment. The original comment requested consistency between the various SAP Addendum documents, Particularly between the Pesticide Investigation and the OU 1 and 3 Basewide Groundwater Monitoring Program SAP Addendums related to the presence of dieldrin in four of the NZ series wells. The Comment Response indicates that dieldrin has historically been present at Landfill Site LF-39 and that NZ-63, 64, 65 and 66 monitor Site LF- 39.

This information was not included in the Pesticide Investigation SAP which specifically requested information regarding potential source areas and could potentially impact the current Pesticide Investigation drilling program. This information should have been included in the Pesticide Investigation SAP Addendum. All scientific information and rationale related to the proposed work should be recorded in the SAP Addendum to assist the decision makers and the public in adequately assessing proposed SAP activities. Please include a discussion in the upcoming Basewide Monitoring Report explaining how Landfill Site LF-39 has been evaluated as a possible dieldrin source area to the Upper Aquifer and whether the existing monitoring well network, or that currently being installed for the Pesticide Investigation, is adequately monitoring LF-39 for dieldrin. Also, in the future please include adequate scientific information and rationale to assist the decision makers and the public in evaluating the adequacy of the SAP Addendums.

3. **Specific Comment Response Number 4** appears to address the comment.